

REMARKS

Claims 1-9 are in the present application.

Claims 1-9 were rejected under 35 USC 103(a) as being unpatentable over Seeley et al. (hereinafter Seeley) in view of Vaio and in further view of FR 2,700,046 A1 to Taillade Bernarde (hereinafter Taillade). This rejection is respectfully traversed.

It is first noted that the cited and relied upon French language Taillade reference was provided without any English translation thereof. That is, the entirety of the Taillade reference cited, relied upon, and supplied by the Office is in French. It is not apparent from the drawings whether Taillade in fact discloses that for which it is cited and relied upon by the Office. The drawings are merely block diagrams having reference numbers, and as such are incapable of disclosing the detail required to sustain the Office's rejection. Furthermore, the rejection cites the specification (pg. 3-4) of Taillade. Clearly the Office relies upon the specification of Taillade as a basis for the pending 35 USC 103(a) rejection of claims 1-9.

Accordingly, it is not clear, from the French language Taillade, exactly how the Office discerned what is disclosed by the cited and relied upon Taillade since the drawings do not clearly disclose that for which the reference was cited and relied upon and the entire reference is in French.

Applicants respectfully request that the Office withdraw the 35 USC 103(a) rejection relying on Taillade since prosecution of a U.S. patent within the USPTO

is conducted on the basis of written English language documents, or supply a full translation of Taillade.

Furthermore, since the pending Office Action is made Final, Applicants request that the Office reconsider and remove the finality of the Office Action in the event that the claim amendments submitted herewith do not place the application in a condition for allowance and the Office maintains the 35 USC 103(a) rejection based on the un-translated Taillade reference.

Regarding the cited and relied upon Seeley and Vaio references, it is respectfully submitted that neither of these references disclose Applicants' claimed security system having, in relevant part as expressed in claim 1,

a plurality of camera devices for monitoring said specified place, said camera comprising a data-processing component for detecting said intruder; (emphasis added)

Clearly, Applicants claim a security system having a plurality of camera devices for monitoring the specified place, the camera including a data-processing component for detecting the intruder. As discussed in the specification at page 8, lines 7- 20, data-processing component 42 of exemplary camera 21 "has a function of motion detection for detecting objects performing specified movements. Specifically, when an image of a moving intruder is imaged in camera image-receiving component 41, the presence of the intruder can be detected from the information relating to movement in the image data in the data-processing component 42 which has received the corresponding image data."

It is submitted that Seeley and Vaios do not disclose or suggest Applicants' claimed security system having a plurality of camera devices for monitoring the specified place, the camera including a data-processing component for detecting the intruder. This aspect of Applicants' claimed invention does not appear to be disclosed or suggested by the cited and relied upon Seeley and Vaios references. As discussed above, it is unclear what the French Taillade discloses.

Nor do the cited and relied upon references appear to provide any motivation for modifying the disclosed cameras therein to the camera include a data-processing component for detecting the intruder.

Even assuming (though not admitted by Applicants) that the un-translated Taillade discloses that for which it was cited and relied upon, the combination of Seeley, Vaios, and Taillade does not render Applicants' invention, as claimed in claim 1, obvious.

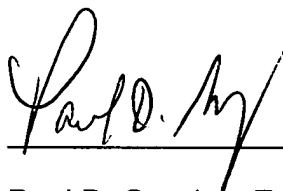
Claims 2-9 depend from claim 1. Therefore, it is respectfully submitted that claims 1-9 are patentable over the cited and relied upon references. Therefore, withdrawal of the 35 USC 103(a) rejection of claims 1-9 and the allowance of claims 1-9 is earnestly solicited.

No new matter has been entered into the application.

Respectfully submitted,

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